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10 Attorneys for
11 Defendants CHE GARIBALDI dba
12 TAQUERIA GARIBALDI; EDUARDO
13 HERNANDEZ; HECTOR MANUAL MARTINEZ
14 GALINDO; and ALEJANDRO RODRIGUEZ

15 UNITED STATES DISTRICT COURT

16 EASTERN DISTRICT OF CALIFORNIA

17 MARTIN J. WALSH, Secretary of Labor,
18 United States Department of Labor,

19 Plaintiff,

20 v.

21 CHE GARIBALDI dba TAQUERIA
22 GARIBALDI, a California corporation;
23 EDUARDO HERNANDEZ, an individual;
24 HECTOR MANUAL MARTINEZ GALINDO,
25 an individual; and ALEJANDRO
26 RODRIGUEZ, an individual,

27 Defendants.

28 Case No: 22:cv-00756-WBS-KJN

**DECLARATION OF ALDEN J. PARKER IN
SUPPORT OF DEFENDANTS' OPPOSITION
TO PLAINTIFF'S APPLICATION FOR
TEMPORARY RESTRAINING ORDER**

Date: July 7, 2022

Time: 10:00 a.m.

Location:

Courtroom 5, 14th Floor
Robert T. Matsui Courthouse
501 I Street
Sacramento, CA 95814

Complaint Filed: May 4, 2022

Trial Date: None Set

DECLARATION OF ALDEN J. PARKER

I, Alden J. Parker, declare as follows:

1. I am the Regional Managing Partner for the Sacramento office of Fisher & Phillips, LLP. I am counsel of record for Defendants in this matter. I have personal knowledge of the facts set forth herein, and if called upon to testify thereto, I could and would competently do so under oath.

2. On or about May 2021, the United States Department of Labor (“DOL”) began an investigation into the wage and hour practices of the Company. The DOL then filed an action against the Company in the United States District Court for the Eastern District of California on May 5, 2022, alleging unlawful wage and hour practices and interference with the DOL’s investigation.

3. On May 11, 2022, Plaintiff's counsel Jennifer L. Sta.An sent my office a letter accusing Defendant of threatening its employees with termination and deportation if they cooperate with the Department. Plaintiff's counsel further demanded that my client stipulate to a preliminary injunction.

4. On May 16, 2022, I met and conferred with Plaintiff's counsel regarding Plaintiff's allegations. I informed her that Defendant denied the allegations and would not stipulate to a preliminary injunction based on conduct it did not undertake. Plaintiff's counsel did not respond.

5. Nearly two months later, this motion for a temporary restraining order followed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration is executed on July 6, 2022, at Sacramento, California.

/s/ Alden J. Parker
Alden J. Parker